

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF WARREN POLICE AND FIRE
RETIREMENT SYSTEM, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

WORLD WRESTLING
ENTERTAINMENT, INC., et al.,

Defendants.

Civil Action No. 1:20-cv-02031 (JSR)

**DECLARATION OF STEPHEN G. TOPETZES IN SUPPORT OF REPLY
MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

I, Stephen G. Topetzes, hereby declare pursuant to 28 U.S.C. § 1746, that the following is true and correct.

1. I am admitted to the Bars of the State of Wisconsin and the District of Columbia, and I am admitted *pro hac vice* to this Court for purposes of the above-captioned case.

2. I am a member of the law firm of K&L GATES LLP, attorneys for Defendants World Wrestling Entertainment, Inc. ("WWE" or the "Company"), Vincent K. McMahon, George A. Barrios, and Michelle D. Wilson (collectively, "Defendants") in the above-captioned action.

3. I submit this Declaration based on my personal knowledge in support of the Reply Memorandum of Law in Support of Defendants' Motion to Dismiss (the "Reply").

4. Annexed hereto are true and correct copies of the following documents cited in Defendants' Reply:

Ex. 36 A transcript titled "World Wrestling Entertainment Inc. at Morgan Stanley Technology, Media & Telecom Conference," related to an event held on

February 26, 2019, as provided by FD (Fair Disclosure) Wire and retrieved from Westlaw;

Ex. 37 A transcript titled “World Wrestling Entertainment Inc. at Citi Global TMT West Conference,” related to an event held on January 8, 2019, as provided by FD (Fair Disclosure) Wire and retrieved from Westlaw.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 21st day of July, 2020, at Washington, DC.

By: /s/ Stephen G. Topetzes
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